

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

REX VENTURE GROUP, LLC d/b/a  
ZEEKREWARDS.COM, and PAUL BURKS,

Defendants.

Case No. 3:12-cv-519

**STIPULATION PRESERVING VICTRIABANK'S OBJECTION TO THE COURT'S  
EXERCISE OF PERSONAL JURISDICTION**

The Receiver and non-party Banca Comerciala Victoriabank SA (“Victoriabank”) hereby stipulate that Victoriabank’s counsel’s execution of the Agreement to be Bound (“Agreement to be Bound”) by the Amended Protective Order (“Protective Order”) approved by the Court on August 26, 2014 [ECF No. 244] shall not constitute a waiver of any arguments, objections, or defenses by Victoriabank as to the Court’s exercise of personal jurisdiction over Victoriabank. Following Victoriabank’s counsel’s execution of the Agreement to be Bound, any and all arguments, objections, and defenses Victoriabank has, or may have, with respect to courts of the United States (or any individual state therein) exercising personal jurisdiction over Victoriabank shall be preserved for all purposes.<sup>1</sup>

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<sup>1</sup> All arguments, objections, and defenses raised or relied upon by Victoriabank in its Motion by Special Appearance to Dismiss Receiver’s Motion to Turn Over Assets and/or Find it in Contempt and for Dissolution of February 12, 2016 Order Freezing Assets [ECF No. 494] and associated briefing are expressly preserved following Victoriabank’s counsel’s execution of the Agreement to be Bound.

This 20th day of January, 2017.

By: *s/ Matthew E. Orso*

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KENNETH D. BELL, in his capacity as court-appointed Receiver for Rex Venture Group, LLC d/b/a ZeekRewards.com

By: *s/ Kiran H. Mehta*

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Attorneys for Movant Banca Comerciala Victoriabank, S.A.

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **STIPULATION PRESERVING VICTORIABANK'S OBJECTION TO THE COURT'S EXERCISE OF PERSONAL JURISDICTION** was electronically filed with the Clerk of Court using the CM/ECF system, which automatically serves notification of such filing to all counsel of record.

This 20th day of January, 2017.

*s/ Kiran H. Mehta*  
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Kiran H. Mehta  
North Carolina Bar No. 11011